IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF NEW YORK

CARMELO MILLAN, Individually and on Behalf of All other persons similarly situated,)	
Plaintiffs,)	Judge Hellerstein
i iaintiiis,)	Judge Henerstein
v.)	Case No. 07 CIV 3769
)	
CITIGROUP INC.)	
CITIGROUP TECHNOLOGY, INC.)	
Defendants.)	

FEDERAL RULE OF CIVIL PROCEDURE 7.1 DISCLOSURE STATEMENT

Pursuant to Federal Rule of Civil Procedure 7.1 and to enable District Judges and Magistrate Judges of the Court to evaluate possible disqualification or recusal, Defendants Citigroup Inc. ("Citigroup") and Citigroup Technology, Inc. ("CTI") (collectively "Defendants"), by and through their attorneys, certifies that Citigroup is publicly held and its only United States subsidiary/affiliate that is publicly held is the following: Student Loan Corporation.

Respectfully submitted,

/s/ Kelly Basinger Charnley
Sam S. Shaulson (SS 0460)
Carrie A. Gonell (CG 9931)
MORGAN, LEWIS & BOCKIUS LLP
101 Park Avenue
New York, New York 10178
(212) 309-6000

Michael L. Banks (Pa. I.D. #35052) Sarah E. Bouchard (Pa. I.D. #77088) Sarah E. Pontoski (Pa. I.D. #91569) Kelly Basinger Charnley (Pa. I.D. #200278) Admitted Pro Hac Vice MORGAN, LEWIS & BOCKIUS LLP 1701 Market Street Philadelphia, PA 19103-2921 (215) 963-5387/5077/5059/5763

Attorneys for Defendants

Dated: October 11, 2007

CERTIFICATE OF SERVICE

I, Kelly B. Charnley, Esquire, hereby certify that a true and correct copy of Defendants' Federal Rule of Civil Procedure 7.1 Disclosure Statement was filed electronically with the Clerk of the Court and served by first class, United States Mail this 11th day of October, 2007 upon the following:

Fran L. Rudich, Esquire Seth R. Lesser, Esquire LOCKS LAW FIRM 110 East 55th Street, 12th Floor New York, New York 10022 (212) 838-3333

Jeffrey M. Gottlieb, Esquire BERGER & GOTTLIEB 150 East 18th Street, Suite PHR New York, New York 10003 (212) 228-9795

Attorneys for Plaintiff